August 11, 2003

Subject: Docket 03-104 (BPL)

As a mission radio operator for the Civil Air Patrol (CAP), the United States Air Force Auxiliary, I wish to express my opposition to any changes to Part 15 that would allow for increased amounts of RF energy to be transmitted through power lines. Clearly BPL will pollute the HF frequencies, making them virtually useless for long-range communication. While this may be more acceptable if the HF band was only used by hams chatting about the weather, that is not the case. CAP uses HF for mission-critical communications, and interference from BPL could hinder our ability to communicate effectively over long distances.

CAP uses SSB and AM HF communications for a number of uses, but it is our use of the HF band during search and rescue, disaster relief, and homeland security missions that concerns me the most. Similar to amateur communications, CAP has a nationwide HF communication system that allows us to pass mission-critical traffic across the country when other systems, such as phones and the internet, go down or become otherwise unusable. CAP also participates in a federal government program known as SHARES, where our assets may be called upon to pass National Security Emergency Preparedness traffic. In other words, in the event of a national emergency, we may be relied upon for contingency communications in coordinating federal response to the emergency.

Clearly, if HF communications were to become unusable, a large portion of our communication system would be affected. Though the Civil Air Patrol's communications is not regulated by the FCC (but by the NTIA), I urge you to consider the effects that BPL might have on the RF spectrum as a whole, and think about how realistically RF noise from power lines will really be controlled. Don't ruin HF...tell broadband companies to run fibre for broadband.

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